

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

In re:)
CITY OF DETROIT, MICHIGAN,) Chapter 9
Debtor.) Case No. 13-53846
)
) Hon. Steven W. Rhodes
)

**NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION'S
JOINDER TO THE JOINT MOTION TO AMEND THE SOLICITATION
PROCEDURE ORDER**

National Public Finance Guarantee Corporation (“National”), by and through its undersigned counsel, hereby submits this joinder (the “Joinder”) to the joint motion [Doc. No. 3954] (the “Motion to Amend”) of Assured Guaranty Municipal Corp. and Berkshire Hathaway Assurance Corporation to amend this Court’s Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Adjustment and (II) Approving Notice Procedures Related to Confirmation of the Plan of Adjustment [Docket No. 2984] (the “Solicitation Procedures Order”).¹ In support of this Joinder, National respectfully submits as follows:

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion to Amend.

1. National believes that the relief requested by the Motion to Amend is appropriate, and hereby joins the Motion to Amend. National believes that the addition of the Plan Objection Deathtrap to the Amended Plan and to the form of ballots represents a material modification to the Initial Plan. As a result, parties-in-interest should be afforded the opportunity to challenge the inclusion of this provision under the terms of the negotiated Solicitation Procedures Order.

2. The Plan Objection Deathtrap will likely have a coercive effect on voting. Therefore, the determination of whether this provision is appropriate should be made prior to the dissemination of ballots containing the challenged provision. Doing so will avoid any confusion on the part of creditors who may otherwise believe they are being prematurely forced into deciding whether to avoid interest rate impairment or object to the Amended Plan.

WHEREFORE, National respectfully requests that the Court grant the relief requested in the Motion to Amend and grant such other and further relief as is just and proper.

Dated: April 10, 2014

Respectfully submitted,

/s/ Paul R. Hage
JAFFE, RAITT, HEUER & WEISS, P.C.
Paul R. Hage (P70460)
Louis P. Rochkind (P24121)
2777 Franklin Road, Suite 2500
Southfield, MI 48034
Tel: (248) 351-3000
Fax: (248) 351-3082
Email: phage@jaffelaw.com

and

SIDLEY AUSTIN LLP
Jeffrey E. Bjork
Gabriel R. MacConaill
555 West Fifth Street, Ste. 4000
Los Angeles, CA 90013
Tel: (213) 896-6000
Fax: (213) 896-6600
Email: bjork@sidley.com
Email: gmacconail@sidley.com

SIDLEY AUSTIN LLP
Guy S. Neal
1501 K Street, N.W.
Washington, DC 20005
Tel: (202) 736-8000
Fax: (202) 736-8711
Email: gneal@sidley.com

Attorneys for National Public Finance Guarantee
Corporation